

**IN THE U.S. DISTRICT COURT FOR MARYLAND
SOUTHERN DIVISION**

BEYOND SYSTEMS, INC.

Plaintiff

v.

**WORLD AVENUE U.S.A., LLC
successor by merger to NIUTECH, LLC.,
dba "The Useful" et al.**

Defendants.

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Case No. PJM 08-cv-0921

AFFIDAVIT OF MICHAEL S. ROTHMAN

I, Michael S. Rothman, being of full age, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury as follow :

1. I make this affidavit upon personal knowledge, I am over the age of eighteen (18) years old, and I am competent to testify to the matters stated herein.
2. I am the sole attorney and principal owner of The Law Office of Michael S. Rothman located in Rockville, Maryland, and was so employed during all of 2010.
3. I am also co-counsel for Beyond Systems, Inc. in the underlying matter, along with Stephen Ring.
4. On or about January 8, 2010, I directed Ms. Ornitz to prepare non-party subpoenas to be issued to the following entities in this case : Experian/Consumer Info (Resident Agent), Experian (aka Star Club Rewards) (*two different addresses*), Citibank Mastercard, BMG Music Service, Columbia House (*two different addresses*), Rhapsody

America, LLC, Account Now, LLC, Direct Brands, Inc, StyleMyHouse, LLC, America Online, Inc, Direct TV, Intersection, Inc, Body Sculpture, Tassimodirect, Blockbuster Online DVD Rental, Kraft Food, Inc, Dish Network, Discover Financial Services, Vonage, Match.com, and Netflix.

5. That same day I caused twenty-three (23) subpoenas to be mailed to these entities at their addresses of record. I know this because I have the proofs of mailing in my possession.

6. Unbeknownst to me, the electronic file used to create the non-party subpoenas was saved using Adobe Acrobat Reader software, which by design is not the full version of the Adobe Acrobat software and cannot and save information to the file.

7. On *February 1, 2010*, Defendant served Plaintiff with a “Request for Copies”, seeking copies of the non-party subpoenas issued by Plaintiff. *See* MTD, Ex. 4.

8. As a result, I directed Mr. Ornitz to use the office’s ScanSnap Scanner to scan in the original subpoenas in our file to create an electronic copy of all original non-party subpoenas that we had sent to the recipients to send to Defendant, pursuant to their Request for Copies.

9. At that time, Ms. Ornitz informed me that we had inadvertently mailed twelve (12) of the original subpoenas signed in blue ink to the non-party recipients. The remaining eleven (11) subpoenas in Counsel’s possession were originals. *See Exhibit A.*

10. For the twelve (12) original subpoenas signed in blue ink that were missing, I directed Ms. Ornitz to re-print the exact same subpoena that had been sent out

to non-party recipients on January 8, 2010, for the purposes of re-signing just the subpoena in blue ink without changes.

11. Once Ms. Ornitz re-opened the original files for printing, however, she informed me that previously stored Adobe Acrobat Reader files containing electronic copies of the original non-party subpoenas would not print using the Acrobat Reader software then installed. She was, however, able to open and print the same documents using another .pdf reader in order to print (“Preview”).

12. I asked Mr. Ornitz to describe the process by which she planned to re-create only the **first two pages** of the non-party subpoenas for me to re-sign in blue ink (Attachment A, including the Definitions, and Instructions were not to change).

13. Ms. Ornitz explained to me that she was able to use another .pdf reader (“Preview”) to open the electronic files of the non-party subpoenas to re-print only the two-page subpoenas. The Preview program, however, changed the “check mark” shown on the left side of Defendant’s MTD, Figure 1, to a “circle” on the shown on the right side of Defendant’s MTD, Figure 1.

14. Ms. Ornitz provided me with electronic files containing what I believed to be the **first two pages** all of all twenty-three (23) non-party subpoenas *duces tecum* issued.

15. For the twelve (12) non-party subpoenas in which the originals were inadvertently sent to the recipients, I re-signed the first page of what we believed to be the exact same subpoenas *duces tecum* (including the Attachment A) issued to those same non-parties on January 8, 2010. An exact electronic copy of the first two pages of the

twelve (12) non-party subpoenas in which the originals were inadvertently sent to the recipients is attached here as **Exhibit A**.

16. I electronically compiled the "Attachment A" saved in each of the twenty-three (23) files that I created on my office computer for each non-party recipient, with the electronic copy of the signed two-page subpoena sent to me by Ms. Ornitz to create a complete file for emailing to the Defendant. At the time, I believe that I was merely compiling an electronic copy of the subpoena that had been previously sent to each non-party recipient on January 8th.

17. Between February 5th and 7th, the Washington Metropolitan area received *nearly twenty (20) inches of snow*, closing most area facilities. During the blizzard, I worked from my home computer much of the time. My email records also indicate that I sent multiple copies of the subpoenas, including the Attachment A's, between both my home and office computer during that time.

18. On February 8th, I forwarded Defendant's Counsel complete copies of the electronic files of the non-party subpoenas from my office computer. In my Response, I noted that BSI was serving "signed subpoenas issued by Plaintiff to all third parties; and 2) any documents it has received thus far pursuant to said subpoena. This will confirm that WORLD AVENUE has received copies and responses of all outstanding subpoenas and responses." *See* MTD, Ex. 14.

19. In examining the Attachment A of Exhibit 14 (0087-DirectBrands) with Exhibit 23, BSI (Non-Party Subpoena Responses) 000032, the Attachment A's are not the same.

20. This was an unintentional error on my part in appending the wrong version of Attachment A from my files to the first two pages of the signed subpoenas to non-party recipients.

21. The Properties creation date listed in Defendant's Figure 2 appears to be correct. Our office uses a ScanSnap Scanner in which hard copies of documents can be scanned to create electronic .pdf files. A creation date between February 3rd (or a modification date of February 8th) would comport with my understanding of the facts.

22. On May 21, 2010, I personally mailed letters to all previous twenty-three (23) non-party subpoena recipients listed above to disregard the subpoenas originally sent. A copy of those letters that I prepared and sent are appended to my declaration as **Exhibit B**.

23. On Friday, May 22nd, I sent Defendant's Counsel a comprehensive "Compliance Letter" detailing my extensive efforts between February 1st and May 22nd to resolve any outstanding issues regarding the Court's April 12th Order [DE 212]. *See* MTD, Exhibit 22 [DE 323-23 (p. 3-5 of 71)] (May 21st letter to Counsel bearing files names A-1 through A-8 and detailing the facts as just recited, *attached to Opp. MTD, Exhibit 1 ("the Compliance Letter")*).

24. In accordance with the Compliance Letter and on the same day, May 22nd (*but in a different email and sixteen minutes later*), I sent Defendant's Counsel a copy of all the responses BSI had received from any non-party, *whether previously served upon WAUSA or not*, in an effort to resolve any remaining issues with WAUSA regarding compliance with DE 212. *See* MTD, Ex. 23 [DE 323-24 (p. 2 of 76)].

25. Along with the Compliance Letter, I also sent a complete and detailed listing of all my contacts made with non-party subpoena recipients pursuant to the subpoenas issued on January 8th. A list of those contacts were contained in Exhibit A-8 to the Compliance Letter.

26. I was unaware that any of the versions of the non-party subpoenas I sent to Defendant on February 8th were different in any respect from the subpoenas I actually sent to the non-party recipients on January 8th.

27. Until the filing of the present motion, Defendant's Counsel did not alert Plaintiff's Counsel of any difference in the versions. Any difference in the two versions was entirely unintentional.

28. I cannot locate a copy of the Vonage Letter; the Dish Network Letter; the Blockbuster Online DVD Letter; the Intersections, Inc. Letter; the Citibank Mastercard Letter; the AccountNow Letter; or the StyleMyHouse Letter referenced in Plaintiff's Non-Party Contact Chart attached to the Compliance Letter as Exhibit A-8 sent to the Defendant on May 22nd.

29. I solemnly declare under penalty of perjury that the contents of the foregoing declaration are true and correct.

Executed on :


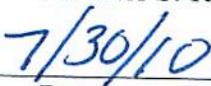

Michael S. Rothman

Date

EXHIBIT A

Issued by the
UNITED STATES DISTRICT COURT

Beyond Systems, Inc., Plaintiff

DISTRICT OF

MARYLAND

SUBPOENA IN A CIVIL CASE

World Avenue U.S.A., LLC, et al., Defendants

Case Number:¹ Dist Ct MD 08-cv-0921 (PJM)

StyleMyHouse, LLC
TO: 135 Townsend St. Suite 626 San Francisco, CA 94110
c/o Corporation Service Company, Resident Agent
2711 Centerville Rd Suite 400 Wilmington, DE 19808

- ☐ YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

- ☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

DATE AND TIME

- ☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):
See Attachment A.

PLACE

Michael S. Rothman, Esq. 401 East Jefferson St. Suite 201 Rockville MD 20850 (301) 251-9660

DATE AND TIME

2/19/2010

- ☒ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)

DATE

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

1/8/2010

Michael S. Rothman, Esq. 401 East Jefferson St. Suite 201 Rockville MD 20850 (301) 251-9660

(See Rule 45, Federal Rules of Civil Procedure, Parts C & D on next page)

¹ If action is pending in district other than district of issuance, state district under case number.

PROOF OF SERVICE

DATE

PLACE

SERVED

SERVED ON (PRINT NAME)

MANNER OF SERVICE

SERVED BY (PRINT NAME)

TITLE

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on

DATE

SIGNATURE OF SERVER

ADDRESS OF SERVER

Rule 45, Federal Rules of Civil Procedure, Parts C & D:

(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d) (2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3) (A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance,

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c) (3) (B) (iii) of this rule, such a person may in order to attend

trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or
(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena, or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

Issued by the
UNITED STATES DISTRICT COURT

Beyond Systems, Inc., Plaintiff

DISTRICT OF

MARYLAND

SUBPOENA IN A CIVIL CASE

World Avenue U.S.A., LLC, et al., Defendants

Case Number:¹ Dist Ct MD 08-cv-0921 (PJM)

Direct Brands, Inc
TO: 1 Penn Plaza 250 W. 34th St. 4th Floor NY NY 10119
c/o Corporation Trust Company, Registered Agent
1209 Orange St, Wilmington DE 19801

☐ YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

DATE AND TIME

☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):
See Attachment A.

PLACE Michael S. Rothman 401 East Jefferson St. Suite 201 Rockville MD 20850
(301)251-9660

DATE AND TIME

2/19/2010

☒ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)

DATE

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

1/8/2010

Michael S. Rothman 401 East Jefferson St. Suite 201 Rockville MD 20850 (301)251-9660

(See Rule 45, Federal Rules of Civil Procedure, Parts C & D on next page)

¹ If action is pending in district other than district of issuance, state district under case number.

PROOF OF SERVICE

DATE

PLACE

SERVED

SERVED ON (PRINT NAME)

MANNER OF SERVICE

SERVED BY (PRINT NAME)

TITLE

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on

DATE

SIGNATURE OF SERVER

ADDRESS OF SERVER

Rule 45, Federal Rules of Civil Procedure, Parts C & D:

(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d) (2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3) (A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance,

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c) (3) (B) (iii) of this rule, such a person may in order to attend

trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or
(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena, or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

Issued by the
UNITED STATES DISTRICT COURT

Beyond Systems, Inc., Plaintiff

DISTRICT OF

MARYLAND

SUBPOENA IN A CIVIL CASE

World Avenue U.S.A., LLC, et al., Defendants

Case Number: ¹Dist Ct MD 08-cv-0921 (PJM)

Account Now, Inc
TO: 2711 Centerville Rd, Suite 400 Wilmington DE 19808
c/o Corporation Service Company, Registered Agent
2711 Centerville Rd, Suite 400 Wilmington DE 19808

☐ YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

DATE AND TIME

☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):
See Attachment A.

PLACE Michael S. Rothman 401 East Jefferson St. Suite 201 Rockville MD 20850
(301)251-9660

DATE AND TIME

2/19/2010

☒ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)

DATE

Michael S. Rothman (Attorney for Plaintiff)
ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER
Michael S. Rothman 401 East Jefferson St. Suite 201 Rockville MD 20850 (301)251-9660

1/8/2010

(See Rule 45, Federal Rules of Civil Procedure, Parts C & D on next page)

¹ If action is pending in district other than district of issuance, state district under case number.

PROOF OF SERVICE

DATE

PLACE

SERVED

SERVED ON (PRINT NAME)

MANNER OF SERVICE

SERVED BY (PRINT NAME)

TITLE

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on

DATE

SIGNATURE OF SERVER

ADDRESS OF SERVER

le 45, Federal Rules of Civil Procedure, Parts C & D:

PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena is issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost wages and reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of places need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d) (2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena an objection to inspection or copying of any or all of the designated materials located at the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an attorney of a party from significant expense resulting from the inspection and copying commanded.

(C) (A) On timely motion, the court by which a subpoena was issued shall modify the subpoena if it

(i) fails to allow reasonable time for compliance,
(ii) requires a person who is not a party or an officer of a party to travel more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c) (3) (B) (iii) of this rule, such a person may in order to

trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or
(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or
(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or
(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena, or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

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Issued by the
UNITED STATES DISTRICT COURT

Beyond Systems, Inc., Plaintiff

DISTRICT OF

MARYLAND

SUBPOENA IN A CIVIL CASE

World Avenue U.S.A., LLC, et al., Defendants

Case Number:¹ Dist Ct MD 08-cv-0921 (PJM)

Rhapsody America, LLC
TO: 11600 Sunrise Valley Dr. Suite 200 Reston VA 20191
c/o Real Networks, Inc, Resident Agent
11600 Sunrise Valley Dr. Suite 200 Reston VA 20191

☐ YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

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DATE AND TIME

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See Attachment A.

PLACE Michael S. Rothman, Esq. 401 East Jefferson St. Suite 201 Rockville MD 20850 (301) 251-9660

DATE AND TIME

2/19/2010

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DATE AND TIME

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ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)

DATE

Michael S. Rothman (Attorney for Plaintiff)

1/8/2010

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

Michael S. Rothman, Esq. 401 East Jefferson St. Suite 201 Rockville MD 20850 (301) 251-9660

(See Rule 45, Federal Rules of Civil Procedure, Parts C & D on next page)

¹ If action is pending in district other than district of issuance, state district under case number.

PROOF OF SERVICE

DATE

PLACE

SERVED

SERVED ON (PRINT NAME)

MANNER OF SERVICE

SERVED BY (PRINT NAME)

TITLE

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

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DATE

SIGNATURE OF SERVER

ADDRESS OF SERVER

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(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena, or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

Issued by the
UNITED STATES DISTRICT COURT

Beyond Systems, Inc., Plaintiff

DISTRICT OF

MARYLAND

SUBPOENA IN A CIVIL CASE

World Avenue U.S.A., LLC, et al., Defendants

Case Number:¹ Dist Ct MD 08-cv-0921 (PJM)

Columbia House
TO: 1225 S. Market St Mechanicsburg PA 17055
c/o Belinda Showers, Resident Agent
1225 S. Market St Mechanicsburg PA 17055

- ☐ YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

- ☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

DATE AND TIME

- ☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

See Attachment A.

PLACE Michael S. Rothman, Esq. 401 East Jefferson St. Suite 201 Rockville MD 20850 (301) 251-9660

DATE AND TIME

2/19/2010

- ☒ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)

DATE

Michael S. Rothman (Attorney for Plaintiff)

1/8/2010

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

Michael S. Rothman, Esq. 401 East Jefferson St. Suite 201 Rockville MD 20850 (301) 251-9660

(See Rule 45, Federal Rules of Civil Procedure, Parts C & D on next page)

¹ If action is pending in district other than district of issuance, state district under case number.

PROOF OF SERVICE

DATE

PLACE

SERVED

SERVED ON (PRINT NAME)

MANNER OF SERVICE

SERVED BY (PRINT NAME)

TITLE

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on

DATE

SIGNATURE OF SERVER

ADDRESS OF SERVER

Rule 45, Federal Rules of Civil Procedure, Parts C & D:

(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d) (2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3) (A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance,

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c) (3) (B) (iii) of this rule, such a person may in order to attend

trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or
(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena, or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

**Issued by the
UNITED STATES DISTRICT COURT**

Beyond Systems, Inc., Plaintiff

DISTRICT OF

MARYLAND

SUBPOENA IN A CIVIL CASE

World Avenue U.S.A., LLC, et al., Defendants

Case Number: ¹Dist Ct MD 08-cv-0921 (PJM)

Columbia House (a.k.a. Direct Brands, Inc)
TO: 1 Penn Plaza 250 W. 34th St. 4th Floor NY NY 10119
c/o Corporation Trust Company, Registered Agent
1209 Orange St, Wilmington DE 19801

☐ YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

DATE AND TIME

☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):
See Attachment A.

PLACE Michael S. Rothman 401 East Jefferson St. Suite 201 Rockville MD 20850
(301)251-9660

DATE AND TIME

2/19/2010

☒ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)

DATE

Michael S. Rothman (Attorney for Plaintiff)

1/8/2010

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER
Michael S. Rothman 401 East Jefferson St. Suite 201 Rockville MD 20850 (301)251-9660

(See Rule 45, Federal Rules of Civil Procedure, Parts C & D on next page)

¹ If action is pending in district other than district of issuance, state district under case number.

PROOF OF SERVICE

DATE

PLACE

SERVED

SERVED ON (PRINT NAME)

MANNER OF SERVICE

SERVED BY (PRINT NAME)

TITLE

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on

DATE

SIGNATURE OF SERVER

ADDRESS OF SERVER

Rule 45, Federal Rules of Civil Procedure, Parts C & D:

(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d) (2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3) (A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance,

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c) (3) (B) (iii) of this rule, such a person may in order to attend

trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or
(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena, or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

Issued by the
UNITED STATES DISTRICT COURT

Beyond Systems, Inc., Plaintiff

DISTRICT OF

MARYLAND

SUBPOENA IN A CIVIL CASE

World Avenue U.S.A., LLC, et al., Defendants

Case Number:¹ Dist Ct MD 08-cv-0921 (PJM)

BMG Music Service (a.k.a. Direct Brands, Inc)
TO: 1 Penn Plaza 250 W. 34th St. 4th Floor NY NY 10119
c/o Corporation Trust Company, Registered Agent
1209 Orange St, Wilmington DE 19801

- ☐ YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

- ☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

DATE AND TIME

- ☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):
See Attachment A.

PLACE Michael S. Rothman 401 East Jefferson St. Suite 201 Rockville MD 20850
(301)251-9660

DATE AND TIME

2/19/2010

- ☒ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)

DATE

Michael S. Rothman (Attorney for Plaintiff)

1/8/2010

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

Michael S. Rothman 401 East Jefferson St. Suite 201 Rockville MD 20850 (301)251-9660

(See Rule 45, Federal Rules of Civil Procedure, Parts C & D on next page)

¹ If action is pending in district other than district of issuance, state district under case number.

PROOF OF SERVICE

DATE

PLACE

SERVED

SERVED ON (PRINT NAME)

MANNER OF SERVICE

SERVED BY (PRINT NAME)

TITLE

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on

DATE

SIGNATURE OF SERVER

ADDRESS OF SERVER

Rule 45, Federal Rules of Civil Procedure, Parts C & D:

(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d) (2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3) (A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance,

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c) (3) (B) (iii) of this rule, such a person may in order to attend

trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena, or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

Issued by the
UNITED STATES DISTRICT COURT

Beyond Systems, Inc., Plaintiff

DISTRICT OF

MARYLAND

SUBPOENA IN A CIVIL CASE

World Avenue U.S.A., LLC, et al., Defendants

Case Number:¹ Dist Ct MD 08-cv-0921 (PJM)

Citibank Mastercard
TO: 399 Park Ave NY NY 10043
c/o The Corporation Trust Incorporated, Registered Agent
351 West Camden St, Baltimore MD 21201

☐ YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

DATE AND TIME

☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):
See Attachment A.

PLACE Michael S. Rothman, Esq. 401 East Jefferson St. Suite 201 Rockville MD 20850 (301) 251-9660

DATE AND TIME

2/19/2010

☒ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)

DATE

Michael S. Rothman (Attorney for Plaintiff)

1/8/2010

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER
Michael S. Rothman, Esq. 401 East Jefferson St. Suite 201 Rockville MD 20850 (301) 251-9660

(See Rule 45, Federal Rules of Civil Procedure, Parts C & D on next page)

¹ If action is pending in district other than district of issuance, state district under case number.

PROOF OF SERVICE

DATE

PLACE

SERVED

SERVED ON (PRINT NAME)

MANNER OF SERVICE

SERVED BY (PRINT NAME)

TITLE

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on

DATE

SIGNATURE OF SERVER

ADDRESS OF SERVER

Rule 45, Federal Rules of Civil Procedure, Parts C & D:

(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d) (2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3) (A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance,

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c) (3) (B) (iii) of this rule, such a person may in order to attend

trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena, or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

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Issued by the
UNITED STATES DISTRICT COURT

Beyond Systems, Inc., Plaintiff

DISTRICT OF

MARYLAND

SUBPOENA IN A CIVIL CASE

World Avenue U.S.A., LLC, et al., Defendants

Case Number: ¹Dist Ct MD 08-cv-0921 (PJM)

Experian Information Solutions, I (a.k.a. Star Club Rewards)
TO: 475 Anton Blvd Costa Mesa, CA 92626
c/o The Corporation Trust Incorporated (resident agent)
351 West Camden St Baltimore MD 21201

- ☐ YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

- ☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

DATE AND TIME

- ☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):
See Attachment A.

PLACE Michael S. Rothman, Esq. 401 East Jefferson St. Suite 201 Rockville MD 20850 (301) 251-9660

DATE AND TIME

2/19/2010

- ☒ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)

DATE

Michael S. Rothman (Attorney for Plaintiff)

1/8/2010

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

Michael S. Rothman, Esq. 401 East Jefferson St. Suite 201 Rockville MD 20850 (301) 251-9660

(See Rule 45, Federal Rules of Civil Procedure, Parts C & D on next page)

¹ If action is pending in district other than district of issuance, state district under case number.

PROOF OF SERVICE

DATE

PLACE

SERVED

SERVED ON (PRINT NAME)

MANNER OF SERVICE

SERVED BY (PRINT NAME)

TITLE

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on

DATE

SIGNATURE OF SERVER

ADDRESS OF SERVER

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(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.

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(B) Subject to paragraph (d) (2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to comply production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3) (A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance,

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c) (3) (B) (iii) of this rule, such a person may in order to attend

trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

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(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

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Issued by the
UNITED STATES DISTRICT COURT

Beyond Systems, Inc., Plaintiff

DISTRICT OF

MARYLAND

SUBPOENA IN A CIVIL CASE

World Avenue U.S.A., LLC, et al., Defendants

Case Number:¹ Dist Ct MD 08-cv-0921 (PJM)

Experian/ConsumerInfo.com
TO: 475 Anton Blvd Costa Mesa CA 92626
c/o The Corporation Trust Incorporated (resident agent)
351 West Camden St Baltimore MD 21201

- ☐ YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

- ☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

DATE AND TIME

- ☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):
See Attachment A.

PLACE Michael S. Rothman, Esq. 401 East Jefferson St. Suite 201 Rockville MD 20850 (301) 251-9660

DATE AND TIME

2/19/2010

- ☒ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)

DATE

Michael S. Rothman, Attorney for Plaintiff

1/8/2010

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

Michael S. Rothman, Esq. 401 East Jefferson St. Suite 201 Rockville MD 20850 (301) 251-9660

(See Rule 45, Federal Rules of Civil Procedure, Parts C & D on next page)

¹ If action is pending in district other than district of issuance, state district under case number.

PROOF OF SERVICE

DATE

PLACE

SERVED

SERVED ON (PRINT NAME)

MANNER OF SERVICE

SERVED BY (PRINT NAME)

TITLE

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on

DATE

SIGNATURE OF SERVER

ADDRESS OF SERVER

Rule 45, Federal Rules of Civil Procedure, Parts C & D:

(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d) (2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3) (A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance,

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c) (3) (B) (iii) of this rule, such a person may in order to attend

trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or
(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena, or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

SA088 (Rev. 1/94) Subpoena in a Civil Case

Issued by the
UNITED STATES DISTRICT COURT

DISTRICT OF MARYLAND

Beyond Systems, Inc., Plaintiff

SUBPOENA IN A CIVIL CASE

World Avenue U.S.A., LLC, et al., Defendants

Case Number:¹ Dist Ct MD 08-cv-0921 (PJM)

Direct TV
 TO: 2230 E. Imperial Hwy El Segundo CA 90245
 c/o CSC Lawyers Incorporating Service Company
 7 St. Paul St. Suite 1660 Baltimore MD 21202

- ☐ YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

- ☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

DATE AND TIME

- ☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

See Attachment A.

PLACE Michael S. Rothman, Esq. 401 East Jefferson St. Suite 201 Rockville MD 20850 (301) 251-9660

DATE AND TIME

2/19/2010

- ☒ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)

DATE

Michael S. Rothman (Attorney for Plaintiff)

1/8/2010

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

Michael S. Rothman, Esq. 401 East Jefferson St. Suite 201 Rockville MD 20850 (301) 251-9660

(See Rule 45, Federal Rules of Civil Procedure, Parts C & D on next page)

¹ If action is pending in district other than district of issuance, state district under case number.

PROOF OF SERVICE

DATE

PLACE

SERVED

SERVED ON (PRINT NAME)

MANNER OF SERVICE

SERVED BY (PRINT NAME)

TITLE

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on

DATE

SIGNATURE OF SERVER

ADDRESS OF SERVER

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(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d) (2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

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(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c) (3) (B) (iii) of this rule, such a person may in order to attend

trial be commanded to travel from any such place within the state in which the trial is held, or

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(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena, or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

Issued by the
UNITED STATES DISTRICT COURT

Beyond Systems, Inc., Plaintiff

DISTRICT OF

MARYLAND

SUBPOENA IN A CIVIL CASE

World Avenue U.S.A., LLC, et al., Defendants

Case Number:¹ Dist Ct MD 08-cv-0921 (PJM)

America Online, Inc
TO: 770 Broadway NY NY 10003
c/o Corporation Service Company, Registered Agent
2711 Centerville Rd, Suite 400 Wilmington DE 19808

- ☐ YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

- ☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

DATE AND TIME

- ☐ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):
See Attachment A.

PLACE Michael S. Rothman 401 East Jefferson St. Suite 201 Rockville MD 20850
(301)251-9660

DATE AND TIME

2/19/2010

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PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)

DATE

Michael S. Rothman (Attorney for Plaintiff)

1/8/2010

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER
Michael S. Rothman 401 East Jefferson St. Suite 201 Rockville MD 20850 (301)251-9660

(See Rule 45, Federal Rules of Civil Procedure, Parts C & D on next page)

¹ If action is pending in district other than district of issuance, state district under case number.

PROOF OF SERVICE

DATE

PLACE

SERVED

SERVED ON (PRINT NAME)

MANNER OF SERVICE

SERVED BY (PRINT NAME)

TITLE

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EXHIBIT B

MICHAEL S. ROTHMAN

ATTORNEY AT LAW

401 EAST JEFFERSON STREET
SUITE 201
ROCKVILLE, MARYLAND 20850

TELEPHONE: (301) 251-9660
FACSIMILE: (301) 251-9610
mike@mikerothman.com
www.mikerothman.com

May 21, 2010

VIA FIRST CLASS MAIL

Discover Financial Services
2500 Lake Cook Rd Riverwoods, IL 60015
c/o The Corporation Trust Incorporated
351 West Camden St Baltimore MD 21201

Re: Beyond Systems, Inc. v. World Avenue USA, LLC, et al.
Case No. PJM 08 cv 0921

To Whom It May Concern:

Please disregard the subpoena issued on January 8, 2010, from Beyond Systems, Inc ("BSI") requesting documents pertaining to the above referenced case. A new subpoena will be forthcoming. If you have not yet responded to the subpoena, please hold all responsive documents until you receive the new subpoena.

If you have any questions or would like to discuss this matter further, you can reach me at (301) 251-9660.

Very truly yours,



Michael Rothman

MICHAEL S. ROTHMAN

ATTORNEY AT LAW

401 EAST JEFFERSON STREET
SUITE 201
ROCKVILLE, MARYLAND 20850

TELEPHONE: (301) 251-9660
FACSIMILE: (301) 251-9610
mike@mikerothman.com
www.mikerothman.com

May 21, 2010

VIA FIRST CLASS MAIL

America Online, Inc
770 Broadway NY NY 10003
c/o Corporation Service Company, Registered Agent
2711 Centerville Rd, Suite 400 Wilmington DE 19808

Re: Beyond Systems, Inc. v. World Avenue USA, LLC, et al.
Case No. PJM 08 cv 0921

To Whom It May Concern:

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Michael Rothman

MICHAEL S. ROTHMAN

ATTORNEY AT LAW

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ROCKVILLE, MARYLAND 20850

TELEPHONE: (301) 251-9660
FACSIMILE: (301) 251-9610
mike@mikerothman.com
www.mikerothman.com

May 21, 2010

VIA FIRST CLASS MAIL

StyleMyHouse, LLC
135 Townsend St. Suite 626 San Francisco, CA 94110
c/o Corporation Service Company, Resident Agent
2711 Centerville Rd Suite 400 Wilmington, DE 19808

Re: Beyond Systems, Inc. v. World Avenue USA, LLC, et al.
Case No. PJM 08 cv 0921

To Whom It May Concern:

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TELEPHONE: (301) 251-9660
FACSIMILE: (301) 251-9610
mike@mikerothman.com
www.mikerothman.com

May 21, 2010

VIA FIRST CLASS MAIL

Direct Brands, Inc
1 Penn Plaza 250 W. 34th St. 4th Floor NY NY 10119
c/o Corporation Trust Company, Registered Agent
1209 Orange St, Wilmington DE 19801

Re: Beyond Systems, Inc. v. World Avenue USA, LLC, et al.
Case No. PJM 08 cv 0921

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TELEPHONE: (301) 251-9660
FACSIMILE: (301) 251-9610
mike@mikerothman.com
www.mikerothman.com

May 21, 2010

VIA FIRST CLASS MAIL

Account Now, Inc
2711 Centerville Rd, Suite 400 Wilmington DE 19808
c/o Corporation Service Company, Registered Agent
2711 Centerville Rd, Suite 400 Wilmington DE 19808

Re: Beyond Systems, Inc. v. World Avenue USA, LLC, et al.
Case No. PJM 08 cv 0921

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TELEPHONE: (301) 251-9660
FACSIMILE: (301) 251-9610
mike@mikerothman.com
www.mikerothman.com

May 21, 2010

VIA FIRST CLASS MAIL

Rhapsody America, LLC
11600 Sunrise Valley Dr. Suite 200 Reston VA 20191
c/o Real Networks, Inc, Resident Agent
11600 Sunrise Valley Dr. Suite 200 Reston VA 20191

Re: Beyond Systems, Inc. v. World Avenue USA, LLC, et al.
Case No. PJM 08 cv 0921

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Michael Rothman

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ROCKVILLE, MARYLAND 20850

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FACSIMILE: (301) 251-9610
mike@mikerothman.com
www.mikerothman.com

May 21, 2010

VIA FIRST CLASS MAIL

Kraft Foods Global, Inc (a.k.a. Tassimodirect.com)
800 Westchester Ave Rye Brook NY 10573
c/o The Corporation Trust Incorporated, Registered Agent
351 West Camden St Baltimore MD 21201

Re: Beyond Systems, Inc. v. World Avenue USA, LLC, et al.
Case No. PJM 08 cv 0921

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Very truly yours,



Michael Rothman

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ATTORNEY AT LAW

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ROCKVILLE, MARYLAND 20850

TELEPHONE: (301) 251-9660
FACSIMILE: (301) 251-9610
mike@mikerothman.com
www.mikerothman.com

May 21, 2010

VIA FIRST CLASS MAIL

Blockbuster Online DVD Rental
1201 Elm St Dallas TX 75270
c/o CSC Lawyers Incorporating Service Company (Resident Agent)
7 St. Paul St, Suite 1660 Baltimore MD 21202

Re: Beyond Systems, Inc. v. World Avenue USA, LLC, et al.
Case No. PJM 08 cv 0921

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FACSIMILE: (301) 251-9610
mike@mikerothman.com
www.mikerothman.com

May 21, 2010

VIA FIRST CLASS MAIL

Kraft Food, Inc
351 West Camden St Baltimore MD 21201
c/o The Corporation Trust Inc (resident agent)
351 West Camden St Baltimore MD 21201

Re: Beyond Systems, Inc. v. World Avenue USA, LLC, et al.
Case No. PJM 08 cv 0921

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mike@mikerothman.com
www.mikerothman.com

May 21, 2010

VIA FIRST CLASS MAIL

Dish Network
7 St. Paul St Suite 1660 Baltimore MD 21202
c/o CSC Lawyers Incorporated Service Co (resident agent)
7 St. Paul St Suite 1660 Baltimore MD 21202

Re: Beyond Systems, Inc. v. World Avenue USA, LLC, et al.
Case No. PJM 08 cv 0921

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FACSIMILE: (301) 251-9610
mike@mikerothman.com
www.mikerothman.com

May 21, 2010

VIA FIRST CLASS MAIL

Discover Financial Services
929 Barrington Dr. Waldorf MD 20602
c/o Dorothy Westberry (owner)
929 Barrington DR. Waldorf MD 20602

Re: Beyond Systems, Inc. v. World Avenue USA, LLC, et al.
Case No. PJM 08 cv 0921

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mike@mikerothman.com
www.mikerothman.com

May 21, 2010

VIA FIRST CLASS MAIL

Vonage
351 West Camden St Baltimore MD 21201
c/o The Corporation Trust Incorporated (resident agent)
351 West Camden St Baltimore MD 21201

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ROCKVILLE, MARYLAND 20850

TELEPHONE: (301) 251-9660
FACSIMILE: (301) 251-9610
mike@mikerothman.com
www.mikerothman.com

May 21, 2010

VIA FIRST CLASS MAIL

Match.com
836 Park Ave 2nd Floor Baltimore MD 21201
c/o National Registered Agents, Inc of MD (resident agent)
836 Park Ave 2nd Floor Baltimore MD 21201

Re: Beyond Systems, Inc. v. World Avenue USA, LLC, et al.
Case No. PJM 08 cv 0921

To Whom It May Concern:

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If you have any questions or would like to discuss this matter further, you can reach me at (301) 251-9660.

Very truly yours,



Michael Rothman

MICHAEL S. ROTHMAN

ATTORNEY AT LAW

401 EAST JEFFERSON STREET
SUITE 201
ROCKVILLE, MARYLAND 20850

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Netflix
836 Park Ave 2nd Floor Baltimore MD 21201
c/o National Registered Agents, Inc of MD (resident agent)
836 Park Ave 2nd Floor Baltimore MD 21201

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May 21, 2010

VIA FIRST CLASS MAIL

Columbia House
1225 S. Market St Mechanicsburg PA 17055
c/o Belinda Showers, Resident Agent
1225 S. Market St Mechanicsburg PA 17055

Re: Beyond Systems, Inc. v. World Avenue USA, LLC, et al.
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May 21, 2010

VIA FIRST CLASS MAIL

Columbia House (a.k.a. Direct Brands, Inc)
1 Penn Plaza 250 W. 34th St. 4th Floor NY NY 10119
c/o Corporation Trust Company, Registered Agent
1209 Orange St, Wilmington DE 19801

Re: Beyond Systems, Inc. v. World Avenue USA, LLC, et al.
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May 21, 2010

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BMG Music Service (a.k.a. Direct Brands, Inc)
1 Penn Plaza 250 W. 34th St. 4th Floor NY NY 10119
c/o Corporation Trust Company, Registered Agent
1209 Orange St, Wilmington DE 19801

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May 21, 2010

VIA FIRST CLASS MAIL

Citibank Mastercard
399 Park Ave NY NY 10043
c/o The Corporation Trust Incorporated, Registered Agent
351 West Camden St, Baltimore MD 21201

Re: Beyond Systems, Inc. v. World Avenue USA, LLC, et al.
Case No. PJM 08 cv 0921

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May 21, 2010

VIA FIRST CLASS MAIL

Experian/ConsumerInfo.com
475 Anton Blvd Costa Mesa CA 92626
c/o The Corporation Trust Incorporated (resident agent)
351 West Camden St Baltimore MD 21201

Re: Beyond Systems, Inc. v. World Avenue USA, LLC, et al.
Case No. PJM 08 cv 0921

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May 21, 2010

VIA FIRST CLASS MAIL

Direct TV
2230 E. Imperial Hwy El Segundo CA 90245
c/o CSC Lawyers Incorporating Service Company
7 St. Paul St. Suite 1660 Baltimore MD 21202

Re: Beyond Systems, Inc. v. World Avenue USA, LLC, et al.
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May 21, 2010

VIA FIRST CLASS MAIL

Intersections Inc
351 West Camden St Baltimore MD 21201
c/o The Corporation Trust Inc (resident agent)
351 West Camden St Baltimore MD 21201

Re: Beyond Systems, Inc. v. World Avenue USA, LLC, et al.
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May 21, 2010

VIA FIRST CLASS MAIL

Body Sculpture
2531 Uniontown Rd Westminster MD 21157
c/o David Krolicki (resident agent)
2531 Uniontown Rd Westminster MD 21157

Re: Beyond Systems, Inc. v. World Avenue USA, LLC, et al.
Case No. PJM 08 cv 0921

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